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December 2, 2003

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BY FEDERAL EXPRESS

Mary L. Cottrell
Secretary
Department of Telecommunications and Energy
Commonwealth of Massachusetts
One South Station, Second Floor
Boston, Massachusetts 02110

Re: D.T.E. 97-88/18 – Payphone Services

Dear Ms. Cottrell:

The NEPCC is in receipt of the November 17, 2003 revision filed by Verizon Massachusetts to its TELRIC-based rates for PAL and PASL services. The NEPCC commends the Department for seeking this update as suggested by the NEPCC.

The NEPCC has no detailed comments on the revisions. However, this latest revision only further confirms that, even with the addition of a “retailing expense” that the NEPCC contends has not been justified, Verizon’s PAL rates which have been in effect since before April of 1997 did not and do not comply with the requirements of the FCC’s Payphone Orders, which required compliant rates by that date. The NEPCC would hope that the Department would promptly issue an order effecting the necessary revisions and directing the appropriate refunds, as required under the pertinent Payphone Orders.

An extra copy of this letter is enclosed to be stamped “filed” or “received” and returned in the enclosed self-addressed, stamped envelope.

Should you have any questions in this matter, please contact the undersigned counsel.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Paul C. Besozzi', written over the typed name.

Paul C. Besozzi
Counsel to the New England Public
Communications Council



Mary L. Cottrell
Secretary
December 2, 2003

cc: Kevin J. Penders, Hearing Officer
Michael Isenberg, Director – Telecommunications Division
Service List